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CERTIFIED BY THE SUPREME COURT OF NEW  
JERSEY AS A CIVIL TRIAL ATTORNEY

November 15, 2021

The Honorable Jessica Allen, USMJ  
USDC, District of New Jersey (Trenton)  
Clarkson S. Fisher Federal Bldg & U  
Trenton, NJ 08608

**RE: Failla v. George's Foods, LLC, et al.**  
**Docket No. 3:20-cv-07109-BRM-TJB**  
**File No. 666.47134**

Dear Sir/Madam:

As the court may recall, we represent defendants in the above referenced matter.

On July 26, 2021, the court entered a scheduling order setting forth dates for the completion of discovery. In addition, September 27, 2021, the court scheduled a settlement conference for December 7, 2021. The conference was scheduled to take place after the exchange of expert reports and before expert depositions.

Despite the diligent efforts of the parties, due to issues beyond the control of counsel (specifically expert schedules and availability), both parties jointly request an extension of the deadlines in the July 26, 2021 scheduling order. In that regard, we have prepared the attached consent order for the court's consideration.

We are of course available for a conference call if the court would like to discuss these issues further.

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Very truly yours,

/s Paul Daly

Paul Daly

PD:ld

cc: David T. Sirotkin, Esq.  
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